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July 16, 2025

Office of the Federal Public Defender

Southern District of Texas

440 Louisiana Street, Suite 1350

Houston, TX 77002

United States Courts
Southern District of Texas
FILED

JUL 2 3 2025

Nathan Ochsner, Clerk of Court

Re: Emergency Request for Legal Representation – Peter-Eugene : Alvarado© (Mentally Disabled Adult, Arrested as a Minor)
To the Honorable Federal Public Defender,

I, Brandon-Meion: Brown©, am the biological father and legal custodian of Peter-Eugene: Alvarado©, who was arrested at the age of 17 and is now an 18-year-old adult with documented developmental and mental disabilities. Peter is currently confined in Brazoria County Jail in the adult mental health unit. He remains unrepresented by legal counsel who understands or is certified in disability accommodations or ADA civil protections.

Due to his condition, Peter is functionally illiterate, unable to write, and mentally incompetent to defend himself in any legal matter. Under \*\*Federal Rule of Civil Procedure 17(c)(2)\*\* and the holdings in \*H.R. v. Medford\* and \*Estelle v. Gamble\*, the court is obligated to protect and appoint representation for individuals unable to protect themselves due to mental impairment. Additionally, his confinement without access to proper care or representation constitutes a violation of \*\*ADA Title II (42 U.S.C. § 12132)\*\* and civil rights under \*\*42 U.S.C. § 1983\*\*.

Peter has received no post-surgical heart care and continues to face medical neglect while under state custody. His arrest as a juvenile compounds the issue, as he has transitioned I respectfully request your office appoint a federal public defender or qualified private panel attorney with certification or experience in mental disability and ADA litigation. This request is made urgently in the interest of preventing irreparable harm and ensuring due process for a vulnerable and voiceless individual.

Please contact me directly at your earliest convenience to confirm your office's capacity to proceed, or advise on the procedure for judicial appointment of outside disability counsel if applicable.

Respectfully submitted,

Brandon-Meion : Brown©

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